

ESTTA Tracking number: **ESTTA451709**

Filing date: **01/18/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91202554
Party	Plaintiff The Good Earth Corporation
Correspondence Address	Jacqueline P. Scheib Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103 UNITED STATES jscheib@rc.com
Submission	Motion to Extend
Filer's Name	Jacqueline P. Scheib
Filer's e-mail	jscheib@rc.com
Signature	/Jacqueline P. Scheib/
Date	01/18/2012
Attachments	MotionDiscovery.PDF (3 pages)(77375 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Application :
Serial No. 85/337,652 :
For the mark: THE GOOD EARTH :
 :
THE GOOD EARTH CORPORATION, :
Opposer, :
 :
v. :
 :
PIONEER PET PRODUCTS, LLC :
Applicant. :
 :

Opposition No. 91202554

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

CONSENTED MOTION TO EXTEND DISCOVERY CONFERENCE DEADLINE

Pursuant to TBMP §401.01 and subject to approval of the Trademark Trial and Appeal Board, The Good Earth Corporation, Opposer in the above-identified opposition, by and through its attorney, requests a thirty (30) day extension of time to commence these proceedings, including without limitation, to participate in the Discovery Conference which is currently scheduled to take place on January 24, 2012. The extension is necessary for Opposer's counsel since it was recently appointed attorney of record for this proceeding and an extension would allow the opportunity to review the case and prepare for the conference and other proceedings.

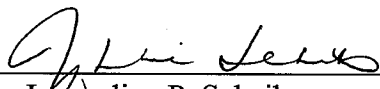
Applicant has consented to the thirty (30) day extension of time for the conference and other proceedings, through a telephone call that was held on January 16, 2012 between Applicant's and Opposer's counsels.

Opposer hereby moves, with the consent of Applicant, to extend the deadlines by thirty (30) days to the following dates:

Deadline for Discovery Conference	2/23/2012
Discovery Opens	2/23/2012
Initial Disclosures Due	3/24/2012
Expert Disclosures Due	7/22/2012
Discovery Closes	8/21/2012
Plaintiff's Pretrial Disclosures	10/5/2012
Plaintiff's 30-day Trial Period Ends	11/19/2012
Defendant's Pretrial Disclosures	12/4/2012
Defendants' 30-day Trial Period Ends	1/18/2013
Plaintiff's Rebuttal Disclosures	2/2/2013
Plaintiff's 15-day Rebuttal Period Ends	3/4/2013

Dated: Jan. 18, 2012

Respectfully submitted,

By 
Jacqueline P. Scheib
Attorney for Opposer

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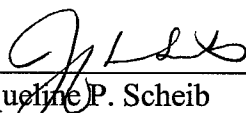
CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2012 a copy of the foregoing Consented Motion to Extend Discovery Conference Deadline was served on Applicant's counsel, Kyle M. Costello, via regular mail to:

Kyle M. Costello
Boyle Frederickson SC
840 N. Plankinton Avenue
Milwaukee, WI 53203-1802

Dated: January 18, 2012

ROBINSON & COLE LLP

By 

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